analyzes the digital samples to produce a sequence of text, and provides this sequence to the interface software 380." See column 7, lines 35-38. Columns 7-65 of the Gould reference are directed generally to the manner in which the text provided by the speech recognition engine is parsed to discern commands and action items embedded therein. Only beginning at Column 65, Line 52 does Gould actually discuss mechanics of speech recognition.

Independent claim 1 sets forth a method of recognizing speech. The method includes detecting a pre-defined prefix. Section Two of the Office Action alleged that the feature of detecting a pre-defined prefix is provided by the command notation of Gould, "computer please" recited in column 8, lines 38-59; column 33, lines 24-35; and column 42, lines 43-45. However, the entire disclosure of Gould in Column 7 through column 65, line 50, is directed, not to the recognition of speech, but to the characterization of the recognized text. Thus, the "computer please" utterance is first transformed to text by speech recognition software 360, and then the actual text is recognized as a command. This is an important distinction because the manner in which the speech recognition itself is performed is not being affected by the utterance. In distinct contrast, independent claim 1 features a method of recognizing a speech that includes detecting a pre-defined prefix. Then, speech following the prefix is recognized using a set of grammars associated with the detected prefix. While column 66, lines 66-67 of Gould provides, "different constraint grammars may be active at different times..." there is no teaching or suggestion in the entire encyclopedic disclosure of Gould of a user's utterance actually having any ability to select, or otherwise determine, any constraint grammars to be applied to speech following a detected prefix. As set forth on page 12 of the Applicants' specification, "Grammar categories can be deterministically selected by uttering user-specifiable speech prefixes." Further, "In this manner, the word will be recognized based upon a much more constrained grammar and recognition accuracy will be improved." Notwithstanding that important distinction, claim 1 still recites yet another feature that is neither taught nor suggested by Gould. Specifically, the text that is recognized by the associated set of grammars is then directed to a target associated with that set of grammars. While Gould provides extensive parsing and processing of recognized text, there is no indication that recognized speech is provided to any target other than the speech recognition engine itself, or interface software 380/2320. Therefore, Applicants respectfully submit that

original independent claim 1 is allowable over Gould. Further, Applicants respectfully submit that dependent claims 2-11 are similarly allowable by virtue of their dependency, either directly or indirectly from allowable claim 1.

Independent claim 12 recites a data structure for storing information relative to a speech recognition category. The data structure includes a prefix field, a grammar field, an IsRequired field, and a parent field. As set forth above, Applicants respectfully submit that Gould simply does not teach prefixes in the context of speech recognition, but instead identifies commands within detected text. Accordingly, Gould simply does not provide a prefix field. However, even if such a prefix field could be considered present in the Gould reference, there is no indication of a data structure providing a grammar field indicating a set of grammars to use with the category. While the Office Action referred to column 22, lines 1-14 of Gould, that portion of the Gould reference, and essentially the entire disclosure between column 7 and line 51 of column 65 is directed to text. The only discussion of constraint grammars begins after column 65, and there is simply no teaching or suggestion of selectable grammars associated with categories as set forth in independent claim 12. Accordingly, Applicants respectfully submit that independent claim 12 is allowable over Gould. Further, Applicants respectfully submit that dependent claims 13-15 are similarly allowable as well by virtue of their dependency, either directly or indirectly from allowable claim 12.

In conclusion, Applicants respectfully submit that the entire application is now in condition for allowance. Reconsideration and favorable action are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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